



November 13, 2015

Mike Cirian, PE  
US EPA  
108 East 9th Street  
Libby, MT 59923

RE: DEQ Comments – Draft Remedial Investigation/Feasibility Study Work Plan and Phase I Site Characterization Sampling and Analysis Plan, Columbia Falls Aluminum Company Facility, Flathead County, Montana (November 2, 2015).

Mike:

Attached you will find DEQ's comments on the Draft RI/FS Work Plan and Phase I Site Characterization Sampling and Analysis Plan for the CFAC facility. Note that DEQ comments reference pages in the PDF version of the Draft Remedial Investigation/Feasibility Study Work Plan (RI/FS Work Plan) and Phase I Site Characterization Sampling and Analysis Plan (SAP) dated November 2, 2015 and not the redline-strikeout word versions of the documents. DEQ has the following general comments in addition to those provided in the attachment:

DEQ requests that any plans submitted should be provided to both DEQ and EPA for review and comment, and that both agencies be provided notice of any field work to be conducted.

DEQ suggests that EPA require specific deadlines for all deliverables and activities, so that each deadline does not end up in dispute resolution and there is no question about whether the deadlines have been met.

Thank you for the opportunity to provide input on this upcoming work. If you have questions or need anything further, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa M. DeWitt", with a stylized flourish at the end.

Lisa M. DeWitt

Cc: Colleen Owen, DEQ  
Katherine Haque-Hausrath, DEQ Legal  
Damon Repine, CDM